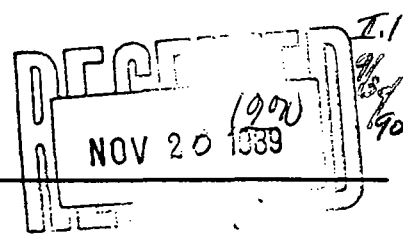




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River Center, 111 North Canal Street, 8th Floor, Suite 855,
Chicago, IL 60606 • (312) 993-1067 • FAX (312) 993-0226

TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION
EPA CONTRACT 68-01-7367

Mr. Duane Heaton
Deputy Project Officer
Emergency Support Section, 5HS-12
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

September 30, 1990

TAT-05-G2-02239

Re: Albion-Sheridan Township Landfill, Albion, Michigan
TDD# 5-9006-05

Dear Mr. Heaton:

On June 5, 1990, the U.S. Environmental Protection Agency (U.S. EPA) tasked the Technical Assistance Team (TAT) to monitor potentially responsible party (PRP) activities at the Albion-Sheridan Township (AST) Landfill in Albion, Calhoun County, Michigan (Figure 1).

The AST Landfill is an abandoned landfill in a rural-residential area at 29991 Erie Rd. in Albion, Calhoun County, Michigan (Figure 2). The landfill has a history of having accepted municipal and industrial wastes. In 1986, an investigation conducted by the U.S. EPA Field Investigation Team (FIT) indicated the presence of approximately 2,000 cubic yards of heavy metal sludge and approximately 35,000 drums of paint waste and spent solvents. The site was placed on the National Priorities List (NPL).

Sampling and analysis by the Calhoun County Health Department in 1988-89 revealed that three of the twenty-one residential wells sampled within a three mile radius of the site contained volatile organic compounds (VOCs).

In August 1989, the TAT conducted a site investigation at the AST Landfill (TDD# 5-8907-33) and documented the presence of approximately thirty drums, approximately fifteen 5-gallon containers, two rusted vats, two partially buried 500-gallon storage tanks, and one aboveground 8,000 gallon tank. Analysis of three drum samples obtained during the August 1989 site investigation indicated that the material was not hazardous.

Additional samples were obtained by the TAT in October 1989 (TDD# 5-8910-04). These results indicated that the material from three drums was ignitable (<140°F). A solvent scan on one drum indicated the presence of five VOCs.

Representatives from the Agency for Toxic Substances and Disease Registry (ATSDR) visited the site in October 1989, and recommended

Roy F. Weston, Inc.

MAJOR PROGRAMS DIVISION

In Association with ICF Technology, Inc., C.C. Johnson & Malhotra, P.C., Resource Applications, Inc.,
and R.E. Sarriera Associates

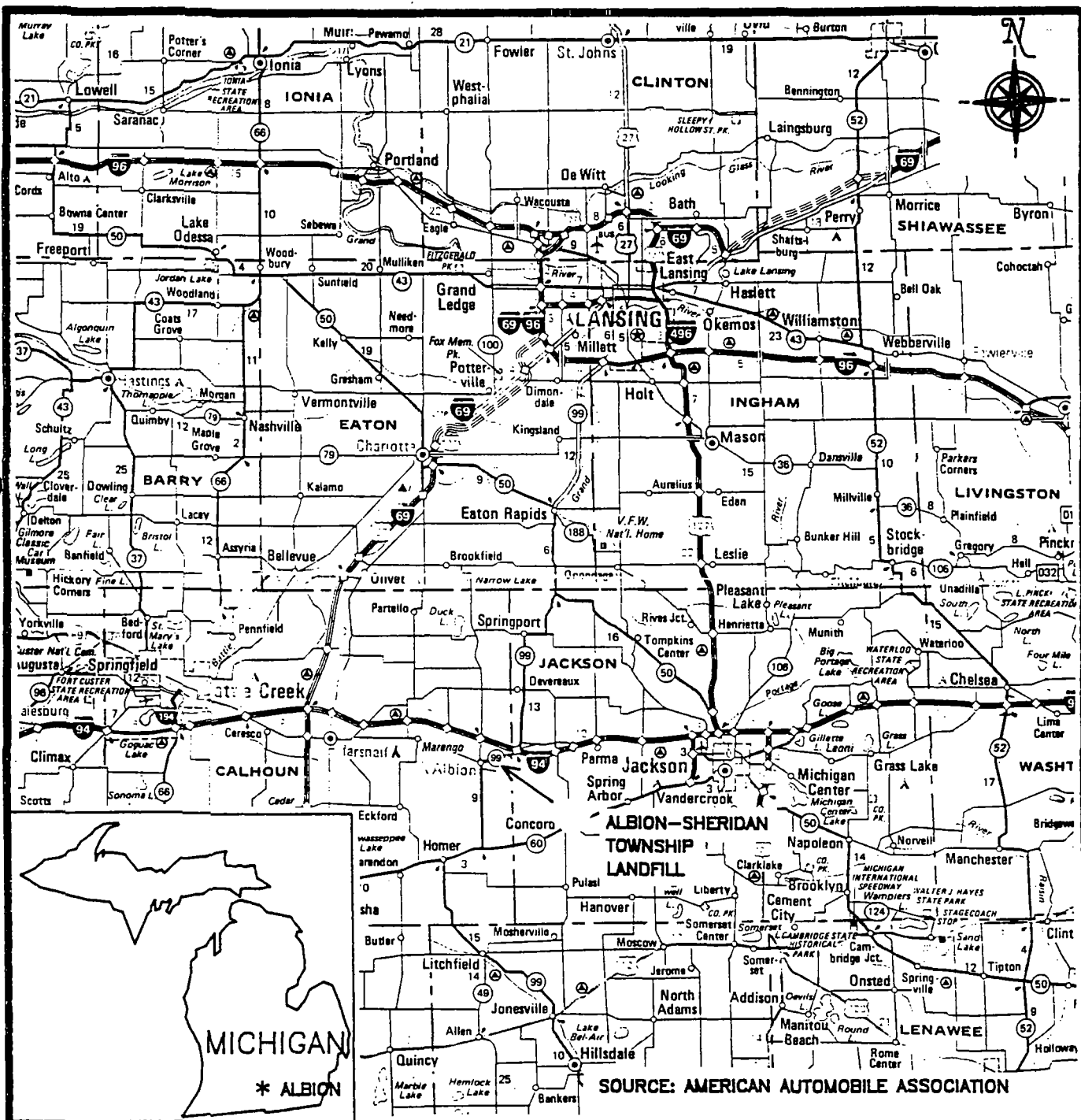


FIGURE 1
SITE LOCATION MAP
ALBION-SHERIDAN TWP. LANDFILL
ALBION, MICHIGAN

SCALE: 1"=APPROXIMATELY 11 MILES

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DRAWN BY AB	DATE 8-21-90	PCS # 2767
APPROVED BY	DATE	TDD # 5-9006-05

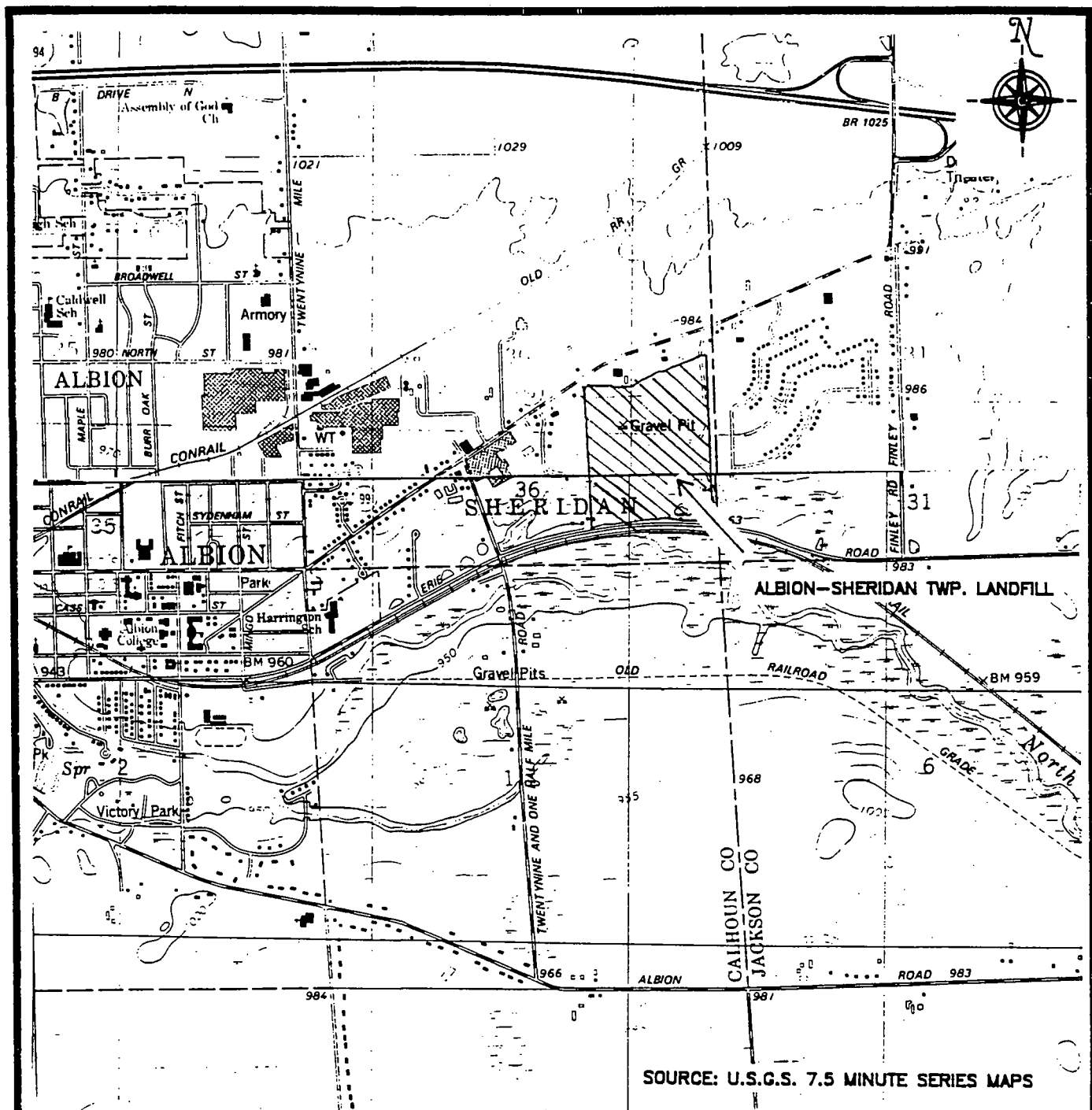


FIGURE 2
SITE MAP
ALBION-SHERIDAN TWP. LANDFILL
ALBION, MICHIGAN

SCALE: 1" = APPROX. 2.5 MILES

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APPROVED BY	DATE	TDD # 5-9006-05



that access to the site be restricted with fencing and that appropriate warning signs be posted.

On March 19, 1990, the U.S. EPA issued an Administrative Order pursuant to Section 106 of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) to the PRPs.

In April, 1990, the TAT and OSC El-Zein measured portions of the site to determine appropriate fencing specifications to restrict site access. The TAT provided OSC El-Zein with cost projections for three different fencing options.

Negotiations between the U.S. EPA and a PRP, Eagle-Picher Industries, Inc., resulted in their agreement to undertake mitigative actions for the removal of surface material. Actions to be taken as outlined in the approved work plan included:

- o sampling, overpacking, removal, and disposal of surface drums and small containers
- o removal of empty surface containers
- o emptying tank contents, if any, and cleaning the tanks.
- o installation of appropriate fencing to restrict vehicle access, as outlined in Scenario 1 (Figure 3), and posting appropriate warning signs around the site perimeter.

The PRPs contracted Great Lakes Environmental Services, Inc. (GLES) to perform mitigative actions as required in the workplan. Activities between June 7 and June 16, 1990, as observed by the TAT included:

- o building a staging pad;
- o sampling, overpacking, and staging of material-containing drums and containers;
- o staging of empty containers found in the main drum area;
- o inspecting the three tanks, pumping out and drumming the contents, cleaning the two 500-gallon tanks, and cutting a large hole in the 8,000-gallon tank; and
- o removing the old south gate and erecting fencing and gates at the locations as illustrated in Figure 4.

The materials on the staging pad consisted of eighteen overpacks, each containing a 55-gallon drum; two 55-gallon drums containing smaller containers; one 55-gallon drum containing the tank wash and

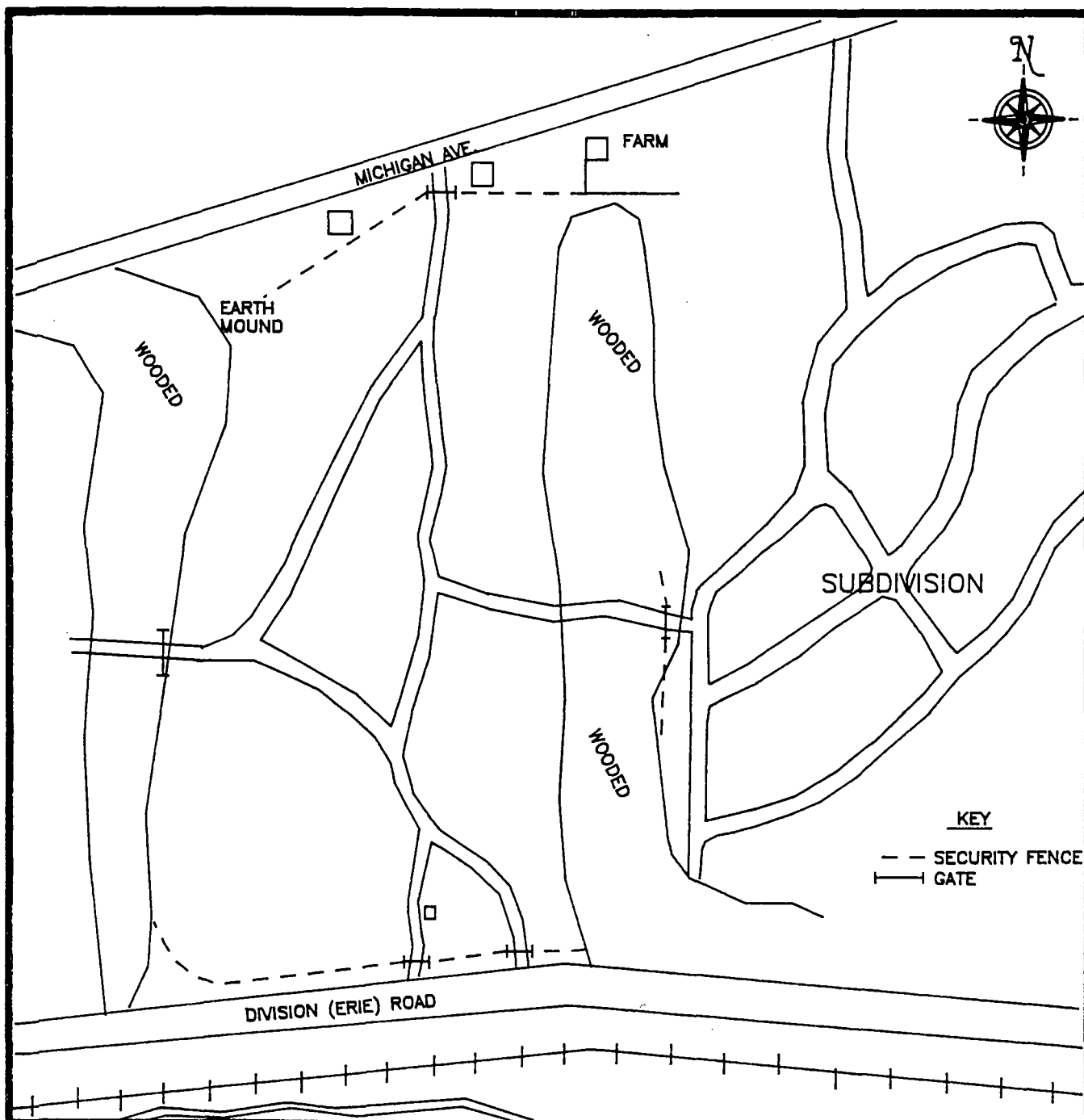


FIGURE 3
 PROPOSED FENCE/GATE LOCATIONS
 SCENARIO 1
 ALBION-SHERIDAN TWP. LANDFILL
 ALBION, MICHIGAN
 NOT TO SCALE

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APPROVED BY DC	DATE 4-13-90	TDD # 5-9006-05

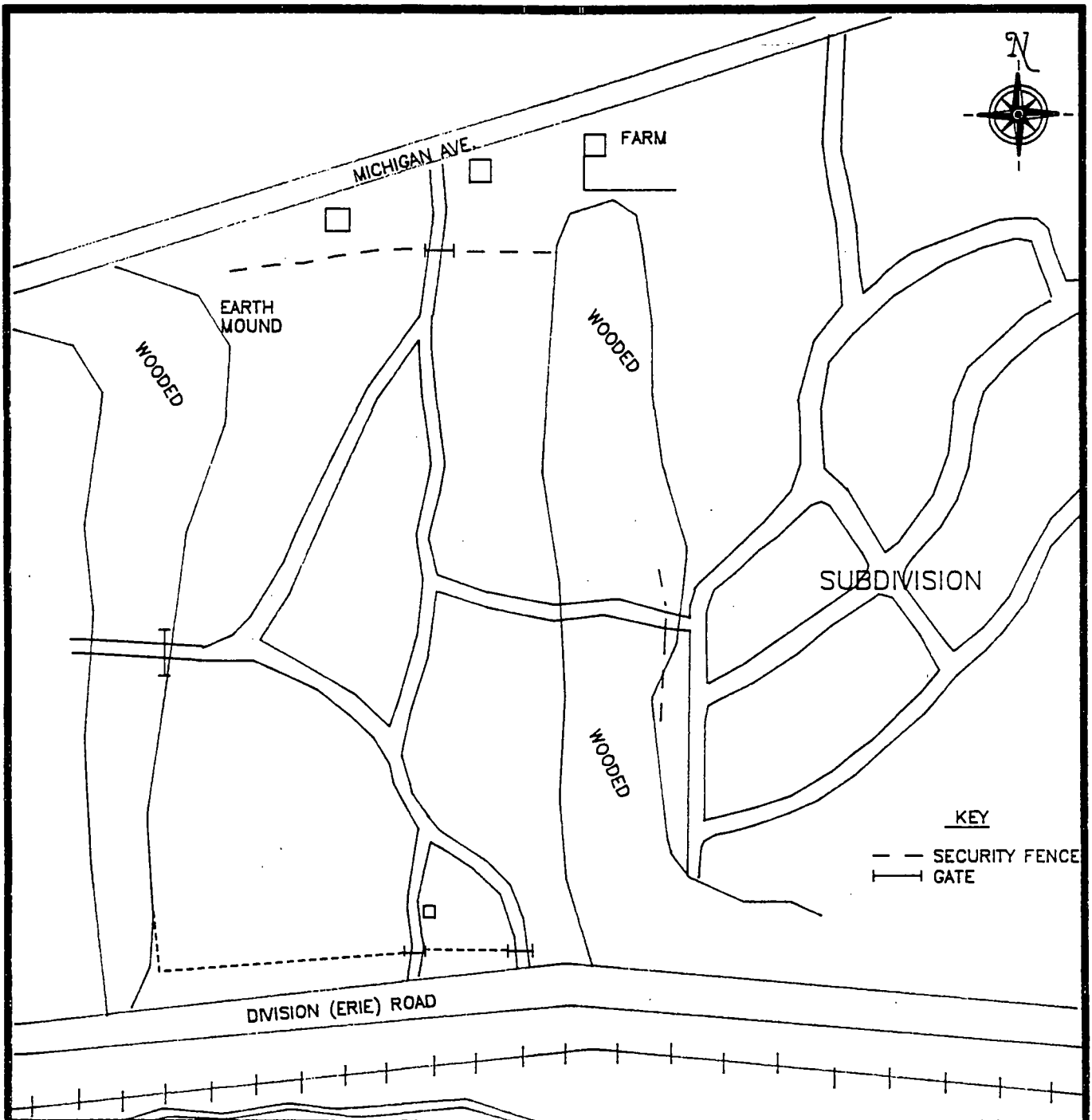


FIGURE 4
 FENCING/GATE LOCATIONS ERECTED BY
 PRP SUBCONTRACTORS - 6/90
 ALBION-SHERIDAN TWP. LANDFILL
 ALBION, MICHIGAN
 NOT TO SCALE

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tank contents; a drum which was found at the guard shack at the south end of the site; and a bag of personal protective clothing from previous site visits. A total of approximately twenty-four empty containers were removed from the main drum area for offsite crushing and disposal.

The investigation of the tanks revealed that UST #1 was empty and the UST #2 contained approximately five gallons of liquid presumed to be gasoline. The above ground 8,000-gallon tank was cut open and found to be completely empty. Air monitoring readings on this tank using a tritector showed background readings for % oxygen and % LEL. Identification tags were found on each of the tanks and read as follows:

UST #1

Underwriters Laboratories, Inc.

-LISTED-

Underground Tank for Flammable Liquids

CONSULT LOCAL AUTHORITIES BEFORE COVERING THIS TANK No. F395118

UST #2

Underwriters Laboratories, Inc.

-LISTED-

Underground Tank for Flammable Liquids

CONSULT LOCAL AUTHORITIES BEFORE COVERING THIS TANK No. F395117

8,000 GALLON TANK

Underwriters Laboratories, Inc.

-INSPECTED-

Underground Storage Tank for Hazardous Fluids

METAL No. 3 U.S. GAGE No. B 709677

DO NOT COVER UP THIS TANK UNTIL INSTALLATION IS APPROVED BY LOCAL
AUTHORITIES

Sampling and overpacking activities during the surface-material removal were somewhat delayed due to the existence of an active hive of bees in the main drum area. Attempts to rid the area of the bees were unsuccessful and an apiarist was called in to remove them.

Waste streams were determined by GLES and are presented in Table 1. Disposal analyses on composite samples for each of the waste streams taken by GLES are presented in Table 2. Debris and (approximately) five gallons of sludge remain in the main drum area, as these were not specifically addressed in the work plan.

TABLE 1

WASTE STREAMS AS DETERMINED BY GLES
AST LANDFILL
ALBION, MICHIGAN
June 11, 1990 and June 13, 1990

Paint Wastes and Epoxy Wastes

A1, B190, B8, B9, B10, B13, B14, B16, B17, B18

Greases

B1, B11, B12, B15, A4

Waters/Rinseates

B2, B3, B4, Rinseate UST #2

Solids/Debris

B22, B24, B26

TABLE 2

ALBION SHERIDAN TOWNSHIP LANDFILL
 COMPOSITED DRUM SAMPLES COLLECTED BY GREAT LAKES ENVIRONMENTAL SERVICES, INC.^a
 ALBION, MICHIGAN
 June 11, 1990
 (Results in parts per million (ppm) or otherwise indicated.)

	PAINT	GREASE	EPOXY	DEBRIS	SOLIDS	TANK	WATER
IGNITABILITY	85°F	>200°F	80°F	>200°F	>200°F	146°F	>200°F
pH (UNITS)	4.45	5.27	8.85	6.60	6.20	8.95	10.45
TCLP METALS							
ARSENIC	ND ^b	ND	ND	ND	ND	ND	0.23
CHROMIUM	ND	ND	ND	ND	ND	ND	0.48
COPPER	ND	ND	ND	ND	ND	0.4	ND
LEAD	16	ND	0.2	ND	ND	ND	ND
SILVER	ND	ND	ND	ND	ND	ND	0.3
ZINC	1.7	13	0.77	0.45	0.28	1.5	3.3

a - Samples analyzed by Midwest Analytical Services, Inc., Detroit, Michigan.

b - Not detected.



During installation of the fencing along the southern boundary of the site, the owner of the southern portion of the property informed the TAT and GLES that he was not aware of any plans to install a fence and that he did not want it on his property. At this time, it was discovered that access to this portion of the landfill was not obtained. The old south gate was then replaced with the new gate, and the remainder of the fencing was not completed until permission was later obtained from the owner. The owner agreed that a fence could be installed if the fence was placed on the legal property line. GLES subcontracted a surveyor to determine this location and the installation of the fence along the southern boundary was completed on July 11, 1990.

On August 16, 1990, the TAT observed the removal of twenty-two drums for disposal at ENSCO in Eldorado, Arkansas.

On September 14, 1990, the TAT, OSC El-Zein, U.S. EPA Office of Regional Counsel Representative Beth Henning, and some interested citizens conducted a site walkthrough at the AST Landfill site, and determined that work had been performed in accordance with the agreed-upon workplan.

Further activities at this site are to be pursued by the U.S. EPA Remedial Branch. Should you have any questions, or require additional information, please feel free to contact us.

Very truly yours,
ROY F. WESTON, INC.

Melody Sullivan
Fol William R. Doyle
Technical Assistance Team
Leader, Region V

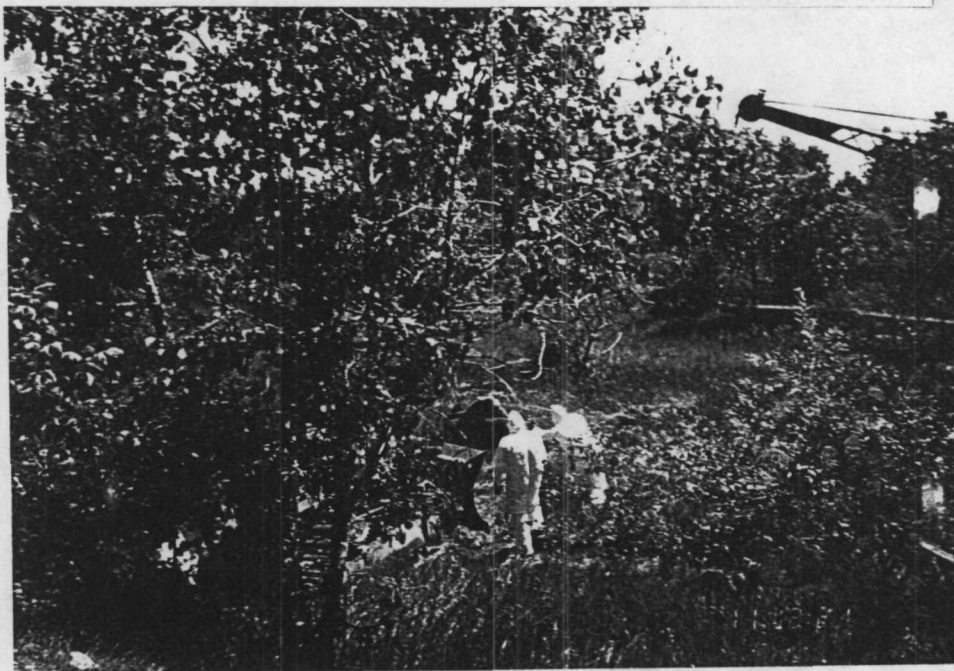
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Attachment

cc: J. El-Zein, OSC



Site: AST LANDFILL
 Photo No: 01 Date: 6-11-90
 Direction: EAST
 Camera: OLYMPUS INFINITY 35mm
 Photographer: A. BENDA *AB*
 Subject: SURFACE DRUMS IN MAIN DRUM
 AREA.



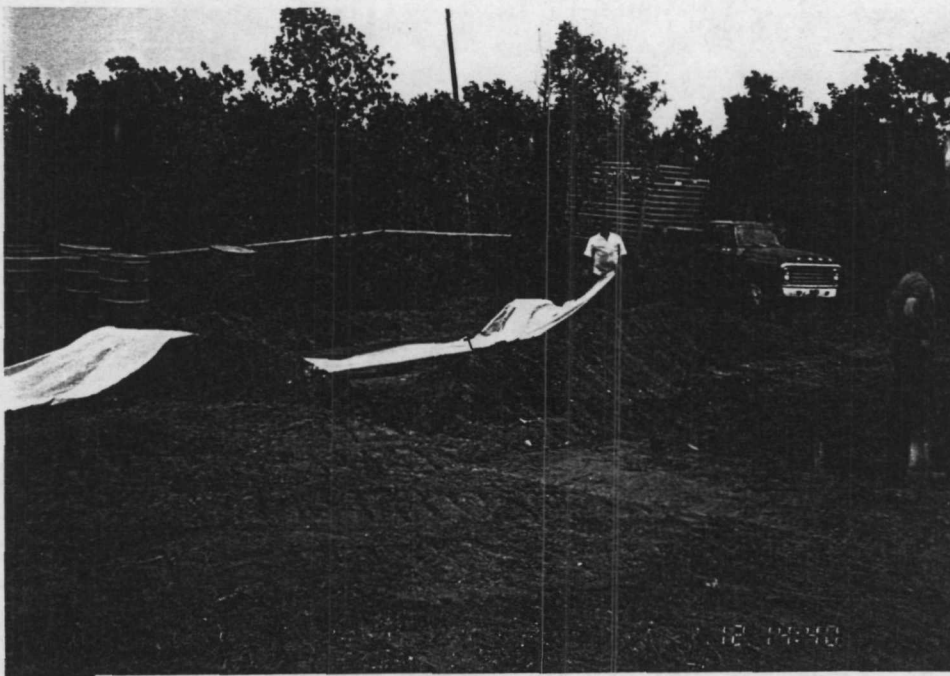
Site: AST LANDFILL
 Photo No: 02 Date: 6-11-90
 Direction: EAST-NORTHEAST
 Camera: OLYMPUS INFINITY 35mm
 Photographer: A. BENDA *AB*
 Subject: ATTEMPTS TO RID AREA OF
 BEES.



Site: AST LANDFILL
 Photo No: 03 Date: 6-12-90
 Direction: EAST
 Camera: OLYMPUS INFINITY 35mm
 Photographer: A. BENDA *AB*
 Subject: APIARY SETTING UP APPARATUS
 TO RID AREA OF BEES.



Site: AST LANDFILL
 Photo No: 04 Date: 6-11-90
 Direction: EAST
 Camera: OLYMPUS INFINITY 35mm
 Photographer: A. BENDA *AB*
 Subject: OVERPACKING OF DRUMS IN
 MAIN DRUM AREA.



Site: AST LANDFILL
 Photo No: 05 Date: 6-12-90
 Direction: NORTHEAST
 Camera: OLYMPUS INFINITY 35mm
 Photographer: A. BENDA *AB*
 Subject: STAGING PAD CONSTRUCTION.



Site: AST LANDFILL
 Photo No: 06 Date: 6-12-90
 Direction: SOUTHWEST
 Camera: OLYMPUS INFINITY 35mm
 Photographer: A. BENDA *AB*
 Subject: CUTTING OF UST #1 TO CHECK
 CONTENTS. TANK WAS EMPTY.



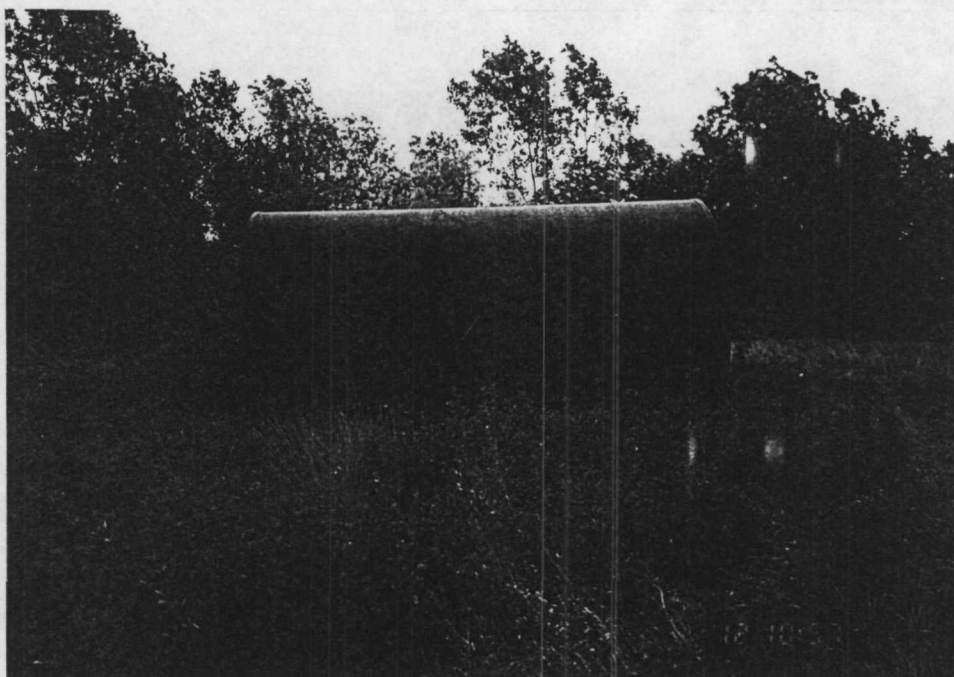
Site: AST LANDFILL
 Photo No: 07 Date: 6-12-90
 Direction: WEST-SOUTHWEST
 Camera: OLYMPUS INFINITY 35mm
 Photographer: A. BENDA *AB*
 Subject: VAC TRUCK USED TO TRANSFER
 CONTENTS OF UST #2 TO 55 GAL DRUMS.



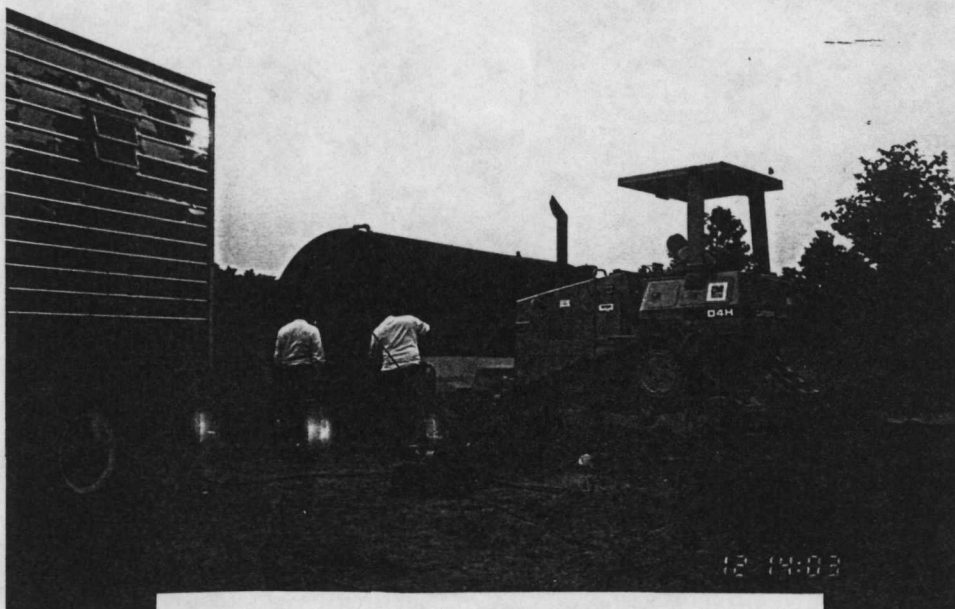
Site: AST LANDFILL
 Photo No: 08 Date: 6-12-90
 Direction: --
 Camera: OLYMPUS INFINITY 35mm
 Photographer: A. BENDA *AB*
 Subject: IDENTIFICATION TAG ON
 UST #1.



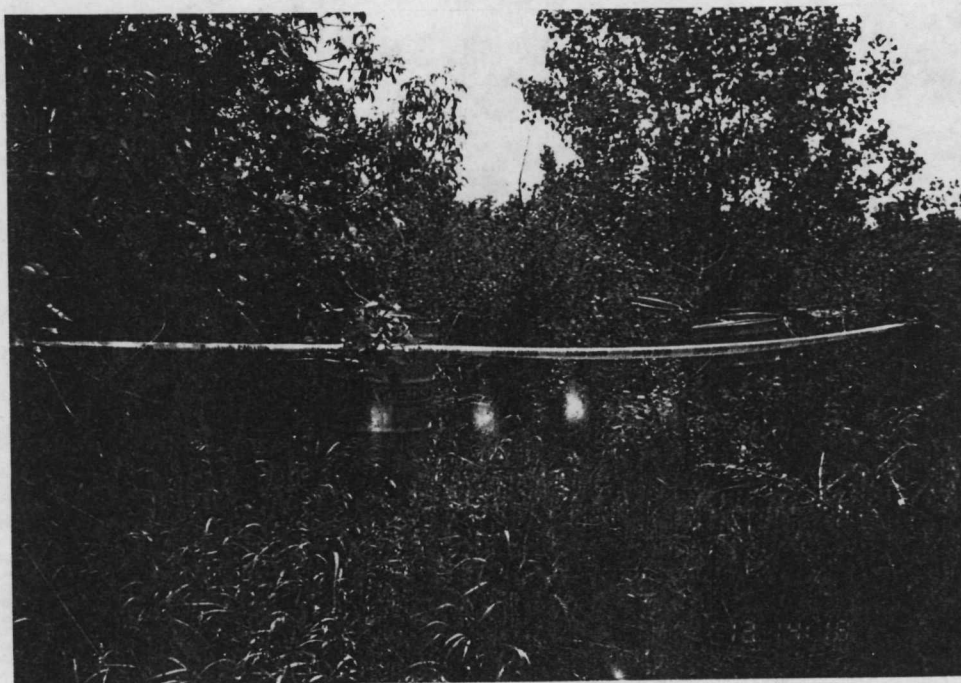
Site: AST LANDFILL
 Photo No: 09 Date: 6-12-90
 Direction: WEST-SOUTHWEST
 Camera: OLYMPUS INFINITY 35mm
 Photographer: A. BENDA *AB*
 Subject: PUMPING CONTENTS OF UST #2.



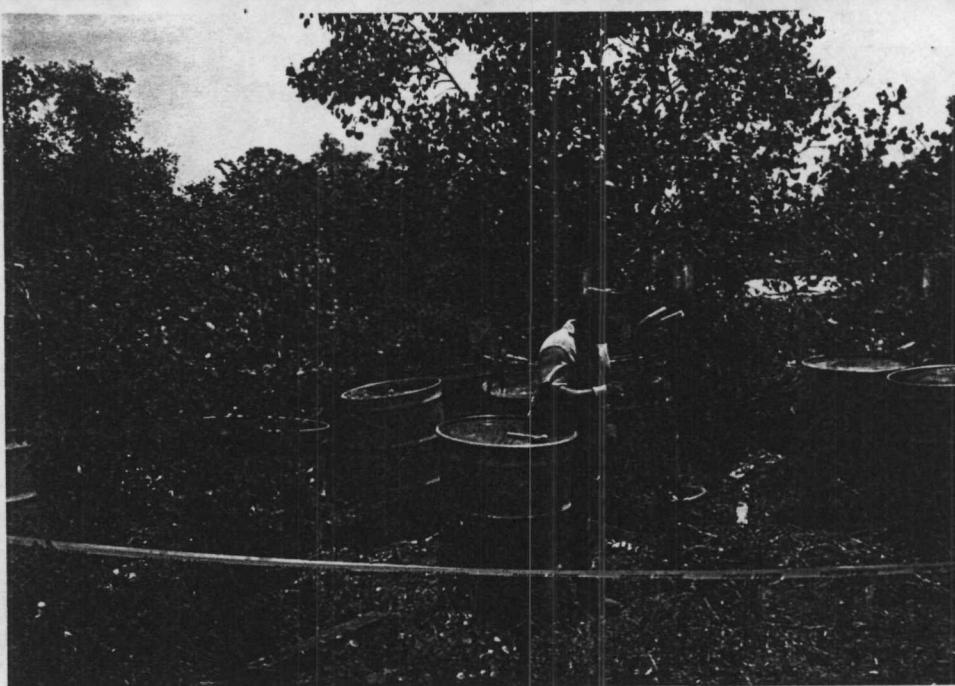
Site: AST LANDFILL
 Photo No: 10 Date: 6-12-90
 Direction: EAST
 Camera: OLYMPUS INFINITY 35mm
 Photographer: A. BENDA *AB*
 Subject: 8,000 GALLON ABOVEGROUND
 STORAGE TANK. TANK WAS FOUND EMPTY.



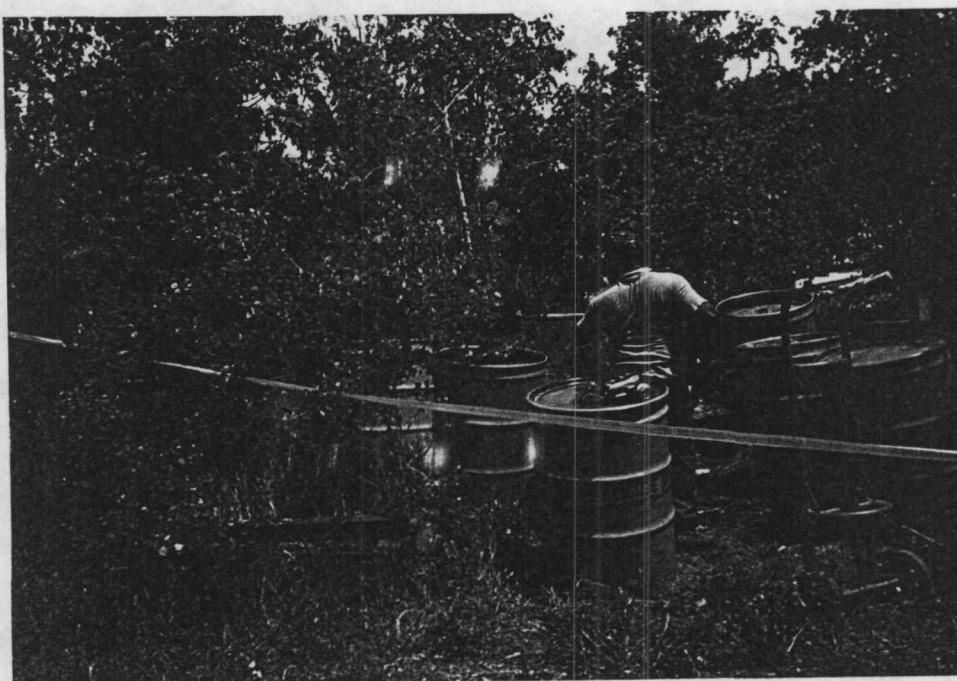
Site: AST LANDFILL
 Photo No: 11 Date: 6-12-90
 Direction: NORTH-NROTHWEST
 Camera: OLYMPUS INFINITY 35mm
 Photographer: A. BENDA *AB*
 Subject: CUTTING OF 8,000 GALLON
 STORAGE TANK.



Site: AST LANDFILL
 Photo No: 12 Date: 6/13/90
 Direction: NORTHEAST
 Camera: OLYMPUS INFINITY 35mm
 Photographer: A. BENDA *AB*
 Subject: OVERPACKED DRUMS STAGED IN
 ORIGINAL DRUM AREA.



Site: AST LANDFILL
 Photo No: 13 Date: 6/13/90
 Direction: NORTHEAST
 Camera: OLYMPUS INFINITY 35mm
 Photographer: A. BENDA *AB*
 Subject: OVERPACKED DRUMS PRIOR TO
 STAGING. NOTE BLUE PAINT ON GROUND.



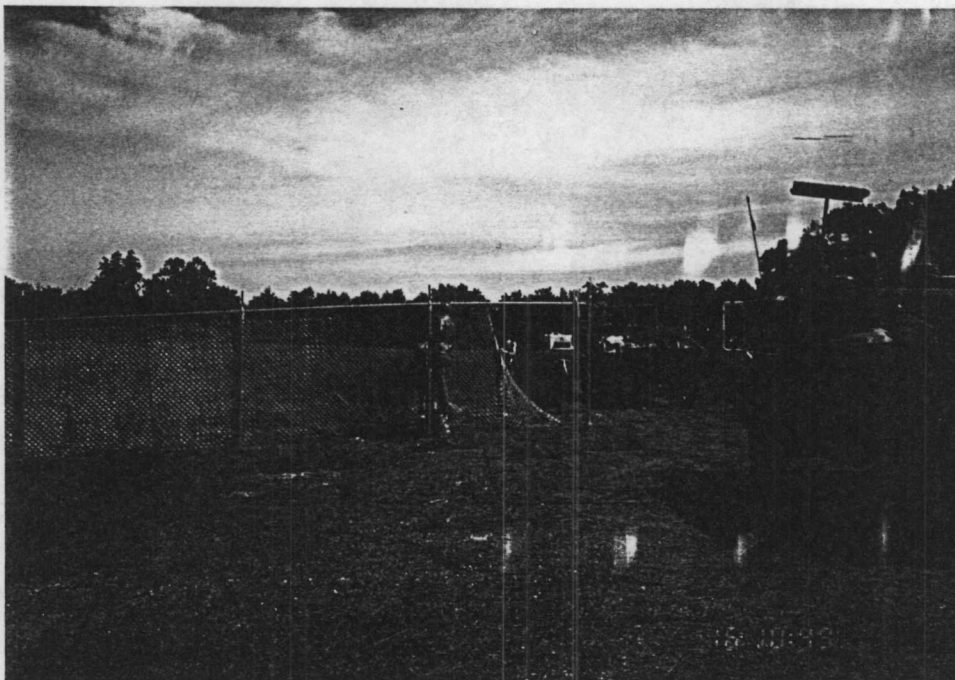
Site: AST LANDFILL
 Photo No: 14 Date: 6/13/90
 Direction: NORTHEAST
 Camera: OLYMPUS INFINITY 35mm
 Photographer: A. BENDA *AB*
 Subject: GREAT LAKES ENV. PERSONNEL
 OVERPACK BLUE PAINT MATERIAL.



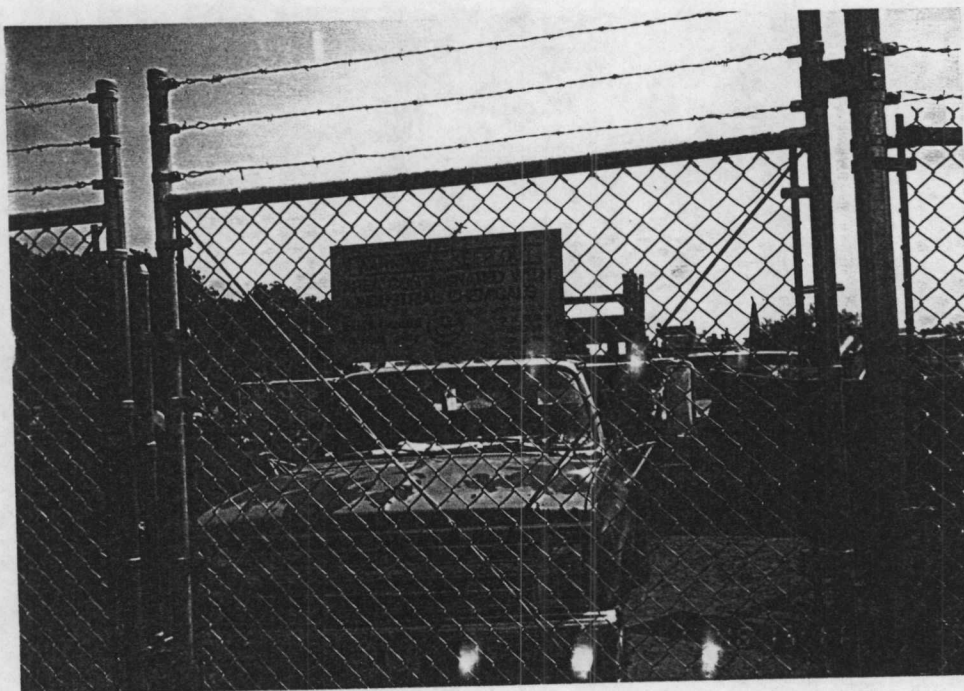
Site: AST LANDFILL
 Photo No: 15 Date: 6/13/90
 Direction: NORTHEAST
 Camera: OLYMPUS INFINITY 35mm
 Photographer: A. BENDA *AB*
 Subject: GREAT LAKES ENV. OPERATOR
 MOVES CRANE W/DOZER FOR STAGING PAD.



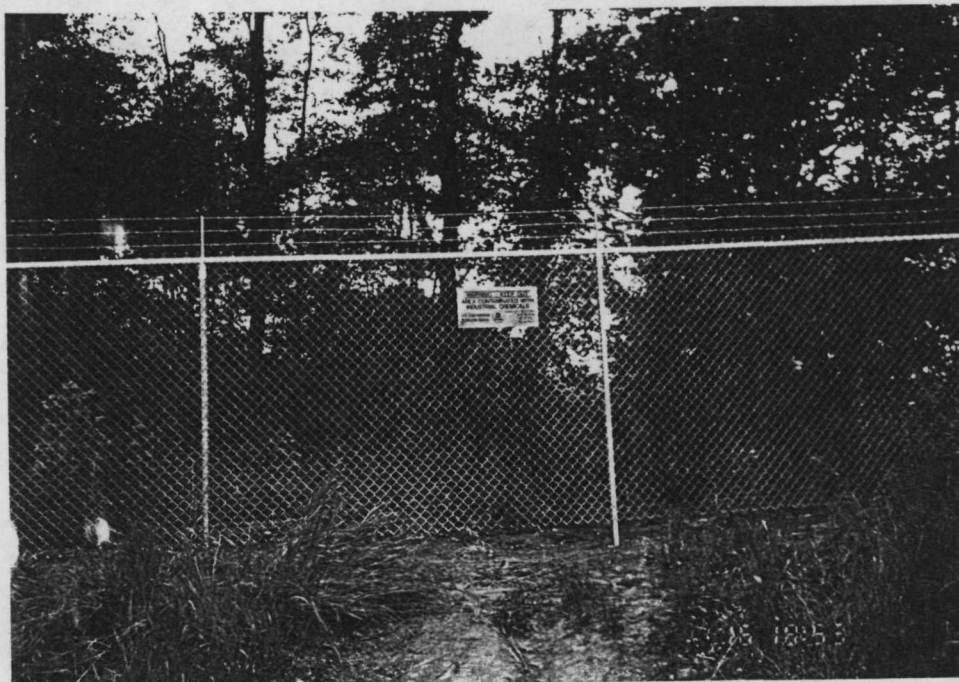
Site: AST LANDFILL
 Photo No: 16 Date: 6/13/90
 Direction: EAST-NORTHEAST
 Camera: OLYMPUS INFINITY 35mm
 Photographer: A. BENDA *AB*
 Subject: MOVEMENT OF OVERPACKED
 DRUMS FROM MAIN AREA TO PAD.



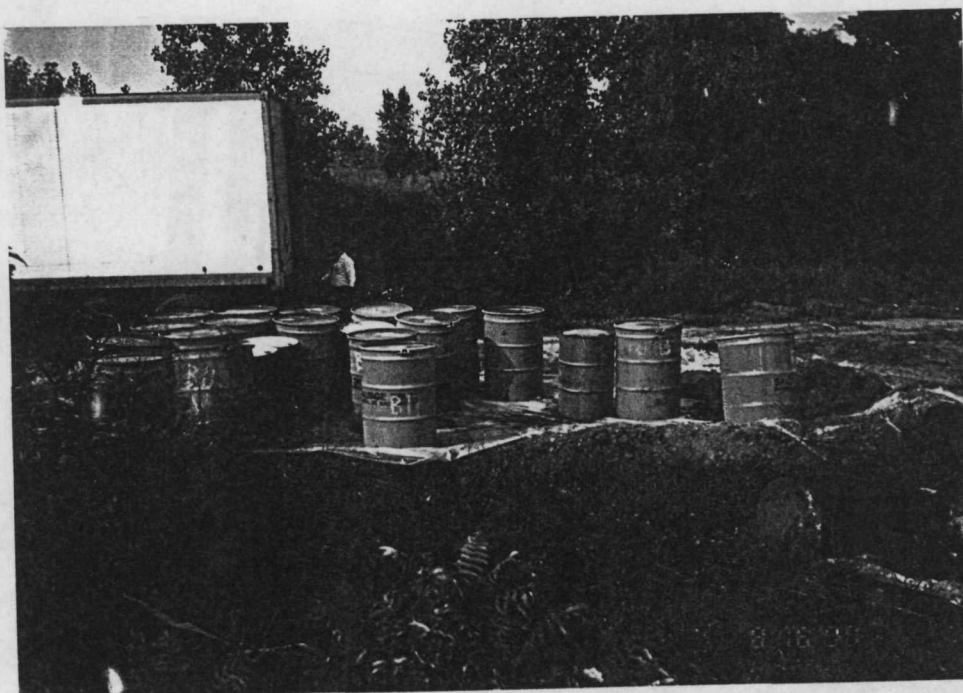
Site: AST LANDFILL
 Photo No: 17 Date: 6/16/90
 Direction: NORTH
 Camera: OLYMPUS INFINITY 35mm
 Photographer: A. BENDA *AB*
 Subject: INSTALLATION OF SECURITY
 FENCING ALONG NORTH EDGE OF SITE.



Site: AST LANDFILL
 Photo No: 18 Date: 6/16/90
 Direction: SOUTH
 Camera: OLYMPUS INFINITY 35mm
 Photographer: A. BENDA *AB*
 Subject: SIGNAGE AT NORTH GATE.



Site: AST LANDFILL
 Photo No: 19 Date: 6/16/90
 Direction: WEST
 Camera: OLYMPUS INFINITY 35mm
 Photographer: A. BENDA *AB*
 Subject: SIGNAGE AND FENCING ALONG
 EASTERN EDGE OF GATE.



Site: AST LANDFILL
 Photo No: 20 Date: 8/16/90
 Direction: SOUTH-SOUTHWEST
 Camera: OLYMPUS INFINITY 35mm
 Photographer: B. VAN OTTEREN *BVo*
 Subject: OVERPACKED DRUMS AWAITING FINAL DISPOSAL.



Site: AST LANDFILL

Photo No: 21 Date: 8/16/90

Direction: SOUTHWEST

Camera: OLYMPUS INFINITY 35mm

Photographer: B. VAN OTTEREN *BV*

Subject: GLES BOBCAT OPERATOR LOADS OVERPACKED DRUMS FROM STAGING AREA FOR FINAL DISPOSAL.



Site: AST LANDFILL

Photo No: 22 Date: 8/16/90

Direction: NORTHEAST

Camera: OLYMPUS INFINITY 35mm

Photographer: B. VAN OTTEREN *BV*

Subject: MAIN DRUM AREA AND STAGING AREA, AFTER DRUMS HAVE BEEN REMOVED.